



The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

August 10, 2004

Judith St. Laurent
Derry Dental Associates
7 Peabody Road
Derry, NH 03038

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Notice of Past Violation

Re: Utilizing an Unregistered Hazardous Waste Transporter

Dear Ms. St. Laurent

The New Hampshire Department of Environmental Services, Waste Management Division ("DES") has documented a violation of the New Hampshire Hazardous Waste Rules relative to the failure to use a New Hampshire registered hazardous waste transporter. On July 13, 2004, Stericycle, Inc. ("Stericycle") picked up and transported hazardous waste from Derry Dental Associates ("DDA") located at 7 Peabody Road, Derry, NH. Stericycle transported hazardous waste from DDA office using Massachusetts Manifest Number MAQ621645. At the time of this pick-up and transportation, Stericycle was not a registered hazardous waste transporter. This Notice of Past Violation is to inform you that the referenced violation is on file at DES. No further action related to the violation documented in this Notice of Past Violation is required.

This notice is being sent to inform DDA of the violation to help DDA prevent similar violations in the future. Enclosed is a summary that lists the past violation. The corrective action taken consists of DDA obtaining the services of a New Hampshire Registered Hazardous Waste Transporter to transport hazardous waste from your office to an authorized facility.

DES recognizes that a great majority of the regulated community wants to prevent pollution and to comply with environmental laws. Your efforts to correct the referenced violation are appreciated.

A current copy of the New Hampshire Hazardous Waste Rules can be obtained from DES's website at <http://www.des.state.nh.us/rules/hwrules.pdf>, or by contacting the Public Information Center at (603) 271-2975. A current copy of the New Hampshire hazardous waste statute can be obtained from the State of New Hampshire's website at <http://gencourt.state.nh.us/rsa/html/indexes/147-A.html>.

If you or your staff have any questions regarding this matter, please feel free to contact Tammy Calligandes at (603) 271-3899.

Sincerely,

COPY

Carl F. Woodbury
Supervisor
Special Investigations Section

CERTIFIED MAIL: 7000 0600 0023 9932 1639

enclosure: Violation Summary, Manifest: MAQ621645

cc: DB/file/HWCS
Gretchen R. Hamel, Legal Unit Administrator
Stericycle, Inc.



DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS MATERIALS

One Winter Street
Boston, Massachusetts 02108

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No. VHDS10184799121648	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Derry Dental Associates 7 Peabody Road Derry NH 03038				A. State Manifest Document Number MA 0621645		
4. Generator's Phone 603 434-4962				B. State Gen. ID		
5. Transporter 1 Company Name STERICYCLE, INC				C. State Trans. ID		
6. US EPA ID Number MAR000009191				D. Transporter's Phone 860 632-0294		
7. Transporter 2 Company Name				E. State Trans. ID		
8. US EPA ID Number				F. Transporter's Phone		
9. Designated Facility Name and Site Address ECOLOGY RECOVERY SYSTEMS, INC. 330 TACOMA ST. SUITE #4 WORCESTER, MA 01605				G. State Facility's ID Not Required		
10. US EPA ID Number MAR000008375				H. Facility's Phone 508 852-8451		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.	
a. HAZARDOUS WASTE LIQUID OR SOLIDS N.O.S. (SILVER), 9, NA3082 PG 111 or NA9189		002	DF	00010	G	
b. NON-HAZARDOUS WASTE LIQUID, MA99 (SPENT DEVELOPER).			DF		G	
c. NON-HAZARDOUS WASTE LIQUID, MA99 (WASTEWATER).			DF		G	
d. RQ, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S. (MERCURY), 9, UN3077, PG 111, LTD. QTY			DF		P	
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.) PHOTOGRAPHIC FIXER a. SILVER OVER 5 MG/L		K. Handling Codes for Wastes Listed Above a. T 3 Qc				
b. scrap dental amalgam for recycling		b.		d.		
15. Special Handling Instructions and Additional Information THIS SHIPMENT OF WASTE IS RESTRICTED FROM LAND DISPOSAL BECAUSE THE CONCENTRATION OF SILVER IS OVER 5 MG/L. IN CASE OF EMERGENCY CALL CHEMTREC 800-234-0051.						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: Judith St. Laurent Signature: [Signature] Date: 07/13/04				Date: 07/13/04		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: [Signature] Signature: [Signature] Date: [Signature]				Date: [Signature]		
19. Discrepancy Indication Space #12 & #13 R/F 4-14-04 #02 CONTAINER WAS NOT FILLED BY BYRON O. ON 7-13-04 WAS FILLED IN BY ROBERT J. FITZPATRICK HIS 2 QUANTITY IS 10 GAL						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name: ECOLOGY RECOVERY SYSTEMS, INC. Signature: [Signature] Date: 07/13/04				Date: 07/13/04		

Form Approved OMB No. 2050-0039

EPA Form 8700-22 (Rev. 9-94) Previous editions are obsolete

COPY>2:

FACILITY MAILED TO GENERATOR STATE

Violation Summary

Requirement(s) Cited	Description of Violation and Corrective Action Taken
Env-Wm 507.03(c)(1)	Failure to ensure that hazardous waste is transported by a registered [New Hampshire] hazardous waste transporter.